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Attorney for Defendant
LEONARDO SAN JUAN

## UNITED STATES DISTRICT COURT

## SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	Criminal Case No. 07CR3239-JM
Plaintiff, vs.	) ) NOTICE OF MOTION TO CONTINUE ) SENTENCING HEARING
LEONARDO SAN JUAN, JR.	) )
Defendant.	) )
	, )

## TO THE CLERK OF THE COURT AND ALL PARTIES OF RECORD:

Leonardo San Juan, Jr., by and through his attorney, Joseph H. Low, IV, hereby moves this court to permit him to continue the Sentencing Hearing, currently scheduled for August 29, 2008, to September 5, 2008. Mr. Low, Retained Defense Counsel, has prior teaching obligations at the Trial Lawyers College. As grounds for this motion, Leonardo San Juan states as follows:

1. Defense Counsel will be teaching at Gerry Spence's Trial Lawyers College from August 25-September 1, 2008, in Wyoming. Trial Lawyers College is a State Bar Approved Seminar for MCLE credits, where defense counsel is a Senior Instructor and will be teaching the entire seminar.

WHEREFORE, for the foregoing reason, and other reasons this Court may deem just and proper, it is respectfully requested that defendant Leonardo San Juan's Motion to Continue Sentencing Hearing be granted and continued to September 5, 2008.

MOTION TO CONTINUE SENTENCING HEARING- CASE NO: 07CR3239-JM

DATED: August 7, 2008

Respectfully Submitted,

/s/ Joseph H. Low IV

JOSEPH H. LOW IV Attorney for Defendant Leonardo San Juan Email: joseph@jhllaw.com

Joseph H. Low IV (SBN 194897) THE LAW FIRM OF JOSEPH H. LOW IV One World Trade Center 1 2 **Suite 2320** 3 Long Beach, CA 90831 Telephone: (562) 901-0840 4 Facsimile: (562) 901-0841 5 Attorney for Defendant LEONÁRDO SAN JUAN 6 7 UNITED STATES DISTRICT COURT 8 SOUTHERN DISTRICT OF CALIFORNIA 9 UNITED STATES OF AMERICA, Criminal Case No. 07CR3239-JM 10 11 Plaintiff, DECLARATION OF JOSEPH H. LOW IV IN SUPPORT OF MOTION TO CONTINUE SENTENCING HEARING VS. 12 LEONARDO SAN JUAN, JR. 13 Defendant. 14 I, Joseph H. Low IV, declare: 15 1. I am an attorney at law, licensed to practice before the United States District Court, 16 Southern District of California. I know the facts set forth herein to be true of my own personal 17 knowledge, except where otherwise indicated. 18 2. I am counsel of record in this action for the Defendant, Leonardo San Juan. 19 3. I will be teaching at the Trial Lawyers College August 25-September 1, 2008. 20 I declare under penalty of perjury under the laws of the State of California that the foregoing 21 is true and correct and that this declaration was executed this 7<sup>th</sup> day of August 2008. 22 23 Respectfully Submitted, 24 /s/ Joseph H. Low IV 25 JOSEPH H. LOW IV 26 Attorney for Defendant Leonardo San Juan 27 28

## 1 UNITED STATES DISTRICT COURT 2 SOUTHERN DISTRICT OF CALIFORNIA 3 UNITED STATES OF AMERICA, Criminal Case No. 07CR3239-JM 4 5 Plaintiff, VS. 6 LEONARDO SAN JUAN, JR. 7 Defendant. 8 9 IT IS HEREBY CERTIFIED THAT: 10 I, MEGAN TANKERSLEY, am a citizen of the United States and am at least eighteen 11 years of age. My business address in One World Trade Center, Suite 2320, Long Beach, CA 12 90831. 13 I am not a party to the above-entitled action. I have caused service of **MOTION TO** 14 CONTINUE SENTENCING HEARING & DECLARATION OF JOSEPH H. LOW IV on 15 the following parties by electronically filing the foregoing with the Clerk of the District Court using ECF System, which electronically notifies them. 16 17 Karen P. Hewitt United States Attorney 18 Nicole Acton Jones Assistant U.S. Attorney 19 I declare under penalty of perjury that the foregoing is true and correct. 20 Executed on August 7, 2008 21 <u>/s/ Megan Tankersley</u> 22 MEGAN TANKERSLEY 23 24 25 26 27 28